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May 15, 2000

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Mr. K. David Waddell
Executive Secretary
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, Tennessee 37243-0505

Re: Docket No. 99-00347 – *AT&T Communications of the South Central States, Inc.'s Petition for the Establishment of an Independent Third Party Testing Program of BellSouth's Operational Support Systems*

Dear Mr. Waddell:

I have received your letter of April 24, 2000 concerning third party testing. In response, I am submitting the following comments on behalf of MCI WorldCom, Inc. ("MCI WorldCom"):

General Comments

Answers to the questions in your letter should help the Tennessee Regulatory Authority determine the extent to which third party testing is needed in Tennessee. MCI WorldCom lacks the detailed knowledge of BellSouth's systems, however, that would be necessary to provide such answers. We suspect that other competitive local exchange carriers find themselves in the same position. And although BellSouth may be able to provide helpful information on these points, its natural incentive will be to downplay any differences between its Operational Support Systems ("OSS") in Tennessee and its OSS in other states. MCI WorldCom respectfully submits that the best way to obtain the requested information is to call upon an objective third party that could evaluate Tennessee-specific differences in BellSouth's OSS.

MCI WorldCom further submits that once Tennessee-specific differences have been identified, the next logical step would be to undertake third party testing of BellSouth's Tennessee OSS to the extent it is different than the OSS in other states, particularly Florida, where the most extensive testing of BellSouth's OSS is being done. This approach would enable the Authority to capitalize on the work being done in

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Florida, while ensuring that BellSouth's OSS works as well in Tennessee as it does in Florida after testing is completed there.

Although MCI WorldCom lacks the requested information concerning Tennessee-specific differences in BellSouth's OSS, MCI WorldCom does have knowledge of the kinds of differences that can exist in an ILEC's OSS in different geographic areas, based on MCI WorldCom's experience in other regions. Examples of such differences are discussed below.

OSS Preordering Functions

Even when preordering interfaces appear to be the same state to state, subtle differences can affect their performance. For example, the address database in one state may use different spellings or abbreviations (Road versus Rd., for instance), which could raise reject rates for CLECs that are using what they believe are "region-wide" rules. The ability of CLECs to "prepopulate" orders (i.e., fill in fields in orders automatically) using CSRs obtained during preordering is particularly important. For example, in New York reject rates initially were higher than 40% before Bell Atlantic's systems enabled CLECs to prepopulate orders. The Authority should ensure that BellSouth's OSS permits prepopulation of orders in Tennessee.

In addition, preordering queries may have to be formatted slightly differently in different states. Another possible difference concerns hours of operation. Although such differences may appear insubstantial, they affect how CLECs must configure their systems and can lead to differences in performance. For example, a difference in hours of operation could affect the intervals for providing customers with service.

OSS Ordering Functions

Even when an ILEC uses the same ordering interface in two states, performance may be affected by how many service order processors serve each state and how orders are transmitted to the service order processors. Differences in the processors themselves also can affect results. Further, different products and features may be available in different states, different ordering codes may be used, and different rules may apply to service orders depending on the state, such as in the case of suspension of service rules. The result of such differences can be different ordering capacities state to state, differences in the handling of orders, and differing performance.

OSS Provisioning Functions

Different provisioning processes may be used in different states. For example, it would be important to know whether BellSouth returns the same information on firm order confirmation notices and order completion notices in different states. It would not be surprising to learn that such differences exist between Florida, a former Southern Bell state, and Tennessee, a former South Central Bell state. And ILECs obviously have different labor forces and labor laws in different states, and may have different employee

training as well. Because field provisioning work necessarily involves different sets of employees from state to state, parity of treatment in one state does not guarantee parity in another.

OSS Maintenance and Repair Functions

Maintenance and repair functions can involve the same kinds of differences state to state as with ordering and provisioning. The same kinds of questions concerning trouble ticket processors, internal procedures, work force and the like come into play. Again, parity of treatment in one state does not assure parity in another.

OSS Billing Functions

Different states have different prices and pricing rules that affect billing processes. Likewise, there may be different product codes used for billing in different states. And daily usage feeds are generated from individual switches in each state, which can differ in many respects. These and other differences can mean that when a billing process is smoothed out in one state, problems may remain in another state in the same region.

OSS Administrative Activities

Although MCI WorldCom understands that the change management process is supposed to work on a regional basis for the BellSouth states, it is certainly possible that state-specific differences could affect how changes are implemented in individual cases. Likewise, administrative activities such as technical assistance may differ from state to state, depending on how BellSouth organizes, trains and allocates its personnel.

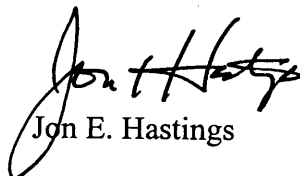
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In short, although MCI WorldCom is not in a position to comment specifically on BellSouth's OSS, based on its experience a thorough and objective third party investigation of Tennessee-specific OSS differences is warranted.

If you have any questions concerning this response, or require any additional information, please do not hesitate to contact me.

Sincerely,

BOULT, CUMMINGS, CONNERS & BERRY, PLC



Jon E. Hastings

CERTIFICATE OF SERVICE

The undersigned certifies that a copy of the foregoing has been hand delivered or mailed to the following persons on the 15th day of May, 2000.

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